

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION

Plaintiff,

V.

Case 04:17-CV-00336-ALM

THURMAN P. BRYANT, III and  
BRYANT UNITED CAPITAL FUNDING,  
INC.

Defendants,

and

ARTHUR F. WAMMEL, WAMMEL  
GROUP, LLC, THURMAN P. BRYANT,  
JR., CARLOS GOODSPEED a/k/a SEAN  
PHILLIPS d/b/a TOP AGENT  
ENTERTAINMENT d/b/a MR. TOP  
AGENT ENTERTAINMENT

## Relief Defendants.

**APPENDIX TO SECOND INTERIM FEE APPLICATION  
FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES**

Exhibit	Description	Citation
A	Standardized Fund Accounting Report	App. 002-005
B-1	Invoice Summary of the Receiver for the Application Period	App. 006-010
B-2	Invoice Summary for Thompson & Knight LLP for the Application Period	App. 011-017
C	Veritas Invoices	App. 018-035

# **EXHIBIT A**

**EXHIBIT A**  
**STANDARDIZED FUND ACCOUNTING REPORT**

Receivership in SEC v. Thurman P. Bryant III, et al.  
Civil Court Docket No. 04:17-CV-00336-ALM

Second Quarterly Reporting Period - 07/01/2017 to 09/30/2017

<b>FUND ACCOUNTING:</b>				
		<b>Reporting Period</b>	<b>Subtotal Prior Periods</b>	<b>Grand Total</b>
Line 1	<b>Beginning Balance (As of 07/01/2017) [aa]</b>	\$30,948.95	\$0.00	\$0.00
	<b><i>Increases in Fund Balance:</i></b>			
Line 2	<b>Business Income</b>	\$0.00	\$0.00	\$0.00
Line 3	<b>Cash and Securities</b>	\$18,625.37	\$1,220.00	\$19,845.37
Line 4	<b>Interest/Dividends Income</b>	\$0.00	\$0.00	\$0.00
Line 5	<b>Business Asset Liquidation</b>	\$0.00	\$0.00	\$0.00
Line 6	<b>Personal Asset Liquidation</b>	\$0.00	\$0.00	\$0.00
Line 7	<b>Third-Party Litigation Income</b>	\$0.00	\$0.00	\$0.00
Line 8	<b>Miscellaneous - Other</b>	\$0.00	\$29,871.56	\$29,871.56
Line 8a	<b>Total Funds Available (Lines 1 -8):</b>	\$49,574.32	\$31,091.56	\$49,716.93
	<b><i>Decreases in Fund Balance:</i></b>			
Line 9	<b>Disbursements to Investors</b>	\$0.00	\$0.00	\$0.00
Line 10	<b>Disbursements for Receivership Operations</b>	\$0.00	\$0.00	\$0.00
Line 10a	<i>Disbursements to Receiver or Other Professionals</i>	\$0.00	\$0.00	\$0.00
Line 10b	<i>Business Asset Expenses</i>	\$2,976.87	\$0.00	\$2,976.87
Line 10c	<i>Personal Asset Expenses</i>	\$2,022.00	\$0.00	\$2,022.00
Line 10d	<i>Investment Expenses</i>	\$65.00	\$142.61	\$207.61
Line 10e	<i>Third-Party Litigation Expenses</i>			
	1. Attorney Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Third-Party Litigation Expenses</i>	\$0.00	\$0.00	\$0.00
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements for Receivership Operations</b>	\$5,063.87	\$142.61	\$5,206.48
<b>Line 11</b>	<b>Disbursements for Distribution Expenses Paid by the Fund:</b>			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<i>Total Plan Development Expenses</i>	\$0.00	\$0.00	\$0.00
Line 11b	<i>Distribution Plan Implementation Expenses</i>			
	1. Fees			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00

	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Plan Implementation Expenses</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements for Distribution Expenses Paid by the Fund</b>	<b>\$5,063.87</b>	<b>\$142.61</b>	<b>\$5,206.48</b>
Line 12	<b>Disbursements to Court/Other</b>			
Line 12a	<i>Investment Expenses/Court Registry Investment</i>			
	<i>System (CRIS) Fees</i>	\$0.00	\$0.00	\$0.00
Line 12b	<i>Federal Tax Payments</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursement to Court/Other:</b>	\$0.00	\$0.00	\$0.00
	<b>Total Funds Disburses (Line 9 - 11):</b>	<b>\$5,063.87</b>	<b>\$142.61</b>	<b>\$5,206.48</b>
Line 13	<b>Ending Balance (As of 09/30/2017):</b>	<b>\$44,510.45</b>	<b>\$30,948.95</b>	<b>\$44,510.45</b>
Line 14	<b>Ending Balance of Fund - Net Assets:</b>			
Line 14a	<i>Cash &amp; Cash Equivalents</i>	\$44,510.45	\$30,958.96	\$44,510.45
Line 14b	<i>Investments</i>	\$2,053.87	\$2,053.87	\$2,053.87
Line 14c	<i>Other Assets or Uncleared Funds (Frozen Accounts)</i>	\$348,828.09	\$10,371.00	\$348,828.09
	<b>Total Ending Balance of Fund - Net Assets</b>	<b>\$395,392.41</b>	<b>\$43,383.83</b>	<b>\$395,392.41</b>

OTHER SUPPLEMENTAL INFORMATION:		Reporting Period	Subtotal Prior Periods	Grand Total
Line 15	<b>Report of Items NOT To Be Paid by the Fund:</b>			
Line 15a	<b>Disbursements for Plan Administration Expenses Not Paid by the Fund:</b>			
	<i>Plan Development Expenses Not Paid by the Fund:</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	<i>Total Plan Development Expenses Not Paid by the Fund</i>	\$0.00	\$0.00	\$0.00
Line 15b	<i>Plan Implementation Expenses Not Paid by the Fund:</i>			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. FAIR Reporting Expenses	\$0.00	\$0.00	\$0.00
	<i>Total Plan Implementation Expenses Not Paid by the Fund</i>	\$0.00	\$0.00	\$0.00
Line 15c	<i>Tax Administrator Fees &amp; Bonds Not Paid by the Fund</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements for Plan Administration Expenses Not Paid by the Fund</b>	\$0.00	\$0.00	\$0.00
Line 16	<b>Disbursements to Court/Other Not Paid by the Fund</b>			
Line 16a	<i>Investment Expenses/CRIS Fees</i>	\$0.00	\$0.00	\$0.00
Line 16b	<i>Federal Tax Payments</i>	\$0.00	\$0.00	\$0.00
	<b>Total Disbursements to Court/Other Not Paid by Fund:</b>	\$0.00	\$0.00	\$0.00
Line 17	<b>DC &amp; State Tax Payments</b>	\$0.00	\$0.00	\$0.00
Line 18	<b>No. of Claims:</b>			
Line 18a	# of Claims Received This Reporting Period	0	0	0
Line 18b	# of Claims Received Since Inception of Fund	0	0	0
Line 19	<b>No of Claimants/Investors</b>			



Line 19a	# of Claimants/Investors Paid This Reporting Period	0	0	0
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	0	0	0

**[aa]** The beginning balance as of July 1, 2017 reflects additional expenses to the Receiver's account not reflected in the first quarter ending June 30, 2017. The additional expenses are noted in Line 10d of the Subtotal Prior Periods column.

## **EXHIBIT B-1**

# THOMPSON & KNIGHT LLP

ATTORNEYS AND COUNSELORS

ONE ARTS PLAZA  
1722 ROUTH STREET • SUITE 1500  
DALLAS, TEXAS 75201-2533  
(214) 969-1700  
FAX (214) 969-1751  
www.tklaw.com

TAX ID No. 75-2813604  
WWW.TKLAW.COM

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VITORIA

November 15, 2017

*SEC v. Thurman P. Bryant, III, et al.*  
Jennifer Ecklund, Receiver  
Thompson & Knight LLP  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

## INVOICE SUMMARY

For Services Rendered During The Application Period July 1, 2017 through September 30, 2017

Our Matter # 524661.000002  
RECEIVERSHIP

Matter Balance Brought Forward .....	\$	13,306.36
Total Fees for Professional Services* .....	\$	70,650.00
Voluntary Reduction (Travel) .....		(1,400.00)
Voluntary Reduction (Applications) .....		(500.00)
Net Fees for Professional Services ** .....		68,750.00
Reimbursable Costs .....		540.07
Net Current Billing For This Matter ** .....	\$	<u>69,290.07</u>
Total Balance Due This Matter .....	\$	<u><u>82,596.43</u></u>

\*Reflects 20% discount on gross fees for professional services.

\*\*Net of time recorded, but not billed, for preparation of Fee Application.

## **SUMMARY OF WORK PERFORMED TO DATE**

### **Initial Analysis**

- Coordinated resources and established protocols for locating, securing, and creating inventory of Receivership Assets and Records
- Consulted and coordinated with the SEC and the U.S. Marshals Service regarding initial location and collection of the Wammel Defendants' Assets and Records
- Engaged Veritas to perform forensic accounting
- Cooperated, communicated, and coordinated with Securities and Exchange Commission
- Oversaw identification and securitization of real and personal property

### **Securing Receivership Assets**

- Oversaw and directed securing of the Bryant Defendants' and Wammel Defendants' real property in the following locations: Frisco, Texas; Kemah, Texas; Texas City, Texas; Austin, Texas; and League City, Texas
- Coordinated with local law enforcement in Texas
- Oversaw process of securing Receiver's jurisdiction in Texas where property is or was believed to be located
- Oversaw analysis of Receivership records and equipment
- Fielded and responded to communications with owners and/or landlords of leased premises
- Oversaw a thorough search of all real property owned and/or leased by the Wammel Defendants

### **Interactions with Vendors, Investors, and Creditors**

- Fielded and responded to communications from investors, creditors, media, United States Attorneys, and other interested parties regarding case status and access to records
- Engaged forensic accountants and conferred with them to develop plan for handling and review of data
- Oversaw the preparation, filing, and service of the Receiver's Initial Report for the Wammel Defendants on all known Investors
- Oversaw the establishment of a line of communication with investors by updating the Receiver's website (<http://bucfreceivership.tklaw.com>) and provided investors with the Receivership Order

### **Liquidation of the Bryant Defendants' Assets**

- Oversaw coordination with appraisers and auctioneers
- Oversaw cataloguing of property seized from the Bryant Defendants
- Obtained Court authority regarding liquidation of assets
- Accomplished liquidation of the Bryant Defendants' assets in the Receiver's possession

- Oversaw preparation of evidence and motions and participated in evidentiary hearings concerning sales of seized property

**Miscellaneous**

- Analyzed strategy and options for proceeding with third party lawsuits including claw backs, fraudulent transfers, and disgorgement
- Oversaw discovery, including subpoenaing records pertinent to the Bryant Defendants and the Wammel Defendants and their business and personal and corporate finances
- Oversaw investigation and asset search and recovery efforts
- Communicated with counsel for Defendants and Relief Defendants
- Analyzed and implemented case management strategy
- Communicated with investors and reviewed correspondence and materials submitted by investors
- Provided extensive cooperation to various government authorities and agencies, including the SEC
- Oversaw work of forensic accountants and analysis of results
- Provided periodic reports to the Court and investors

THOMPSON &amp; KNIGHT LLP

Page 4  
November 15, 2017**SUMMARY OF FEES**

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Discounted Rate/Hr</u></b>	<b><u>Amount</u></b>
Jennifer Ecklund	Receiver	141.30	\$500.00	<b>\$70,650.00</b>

**Reimbursable Costs**

Air fare, lodging, ground transportation, and other vendors (*e.g.*, locksmiths, utility providers, vehicle storage) to complete work performed:

Total Reimbursable Costs .....	\$	540.07
TOTAL VOLUNTARY REDUCTIONS .....	\$	(1,900.00)
NET CURRENT BILLINGS FOR THIS MATTER*** .....	\$	69,290.07
TOTAL BALANCE DUE THIS MATTER .....	<b>\$</b>	<b><u>82,596.43</u></b>

\*Reflects 20% discount on gross fees for professional services.

\*\*Net of time recorded, but not billed, for preparation of Fee Application.

## **EXHIBIT B-2**

# THOMPSON & KNIGHT LLP

ATTORNEYS AND COUNSELORS

ONE ARTS PLAZA  
1722 ROUTH STREET • SUITE 1500  
DALLAS, TEXAS 75201-2533  
(214) 969-1700  
FAX (214) 969-1751  
www.tklaw.com

TAX ID No. 75-2813604  
WWW.TKLAW.COM

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November 15, 2017

*SEC v. Thurman P. Bryant, III, et al.*  
Jennifer Ecklund, Receiver  
Thompson & Knight LLP  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

## INVOICE SUMMARY

For Services Rendered During The Application Period July 1, 2017 through September 30, 2017

Our Matter # 524662.000002  
REPRESENTATION OF RECEIVER

Matter Balance Brought Forward .....	\$	121,265.25
Total Fees for Professional Services* .....	\$	700,874.00
Voluntary Reduction (Travel) .....		(9,248.00)
Voluntary Reduction (Applications) .....		(69,745.00)
Voluntary Reduction (Additional 20% Paralegal Time) .....		(11,110.20)
Voluntary Reduction (Time Under 25 Hours Held Back) .....		(60,086.00)
Net Fees for Professional Services ** .....		550,684.80
Reimbursable Costs .....		4,443.03
Net Current Billing For This Matter ** .....	\$	<u>555,127.83</u>
Total Balance Due This Matter .....	\$	<u><u>676,393.08</u></u>

\*Reflects 20% discount on gross fees for professional services.

\*\*Net of time recorded, but not billed, for preparation of Fee Application, and certain paralegal time.



## SUMMARY OF WORK PERFORMED

### Case Administration

- Successfully moved to expand the Receivership and the asset freeze to and against the Wammel Defendants
- Commenced review of production served on the SEC in advance of the SEC filing the Complaint and any supplemental productions thereafter
- Successfully moved to liquidate and accomplished liquidation of the Bryant Defendants' assets in the Receiver's possession
- Commenced the liquidation process against the Wammel Defendants
- Researched and analyzed options regarding pursuit by Receiver of potential claims against third-parties
- Subpoenaed records pertinent to the Bryant Defendants and the Wammel Defendants as well as their business and personal and corporate finances
- Conducted legal research regarding authority to liquidate property
- Drafted numerous motions and briefs regarding authority to liquidate property
- Drafted responses regarding the significant need to maintain the Receivership and the tremendous consequences of dissolution or suspension of the Receivership
- Conducted research as to persons and entities of interest, including the Relief Defendants and companies owned (beneficially or otherwise) or operated by Defendant Wammel, based on the Receiver's investigation
- Conducted research as to persons and entities of interest, including the Relief Defendants and companies owned or operated by Defendant Bryant, based on the Receiver's investigation
- Sought and/or reviewed information from named Relief Defendants and other persons and entities of interest based on the Receiver's investigation
- Successfully moved for and obtained a preliminary injunction against the Wammel Defendants requiring their compliance with the Receivership Order
- Successfully moved to receive a copy of the return on the search warrant for the purpose of identifying additional Bryant Defendants' assets seized by the FBI
- Drafted various third-party lawsuits in effort to recover funds for Receivership Estate
- Communicated with *pro se* Defendant Bryant regarding his obligations and duties during the Receivership
- Conferred with Defendant Wammel's counsel to discuss going-forward issues
- Maintained the Receiver's bank account in accordance with the Receivership Order
- Satisfied on-going, ordinary course obligations of the Receivership Estate in order to maintain the status quo, including paying rent for the storage units, buying new locks, and having mail forwarded
- Research regarding and confirmation of filings under 28 U.S.C. §754 in each jurisdiction where Thompson & Knight LLP secured Receivership Assets

- Filed notice of Receivership in each district that newly discovered property subject to recovery may lie
- Prepared for preliminary injunction hearing, resulting in the extension of the *ex parte* temporary restraining order against the Wammel Defendants to provide the Court with time to issue an order granting the preliminary injunction
- Took deposition of Defendant Bryant
- Prepared periodic reports to the Court on the status of the Receivership
- Prepared periodic reports to investors on the work of the Receiver and information pertinent to investors' claims
- Cooperated with various government agencies to assist in their investigation
- Maintained database of investor claims
- Developed information pertinent to the possible location of additional Receivership assets

#### **Initial Analysis of the Wammel Defendants' Receivership Assets**

- Coordination of resources and establishment of protocols for locating, securing, and creating inventory of the Wammel Defendants' Assets and Records
- Research regarding existence of real property and personalty to be seized from the Wammel Defendants
- Consultation and coordination with the SEC, the Receiver, and the U.S. Marshals Service regarding initial location and collection of the Wammel Defendants' Assets and Records
- Identified and secured real and personal property of the Receivership
- Reviewed and analyzed seized records and equipment

#### **Securing of the Wammel Defendants' Receivership Assets**

- Secured for the Receiver real property in the following locations: Frisco, Texas; Kemah, Texas; Texas City, Texas; Austin, Texas; and League City, Texas
- Secured for the Receiver storage units leased by Defendant Wammel
- Secured for the Receiver an aircraft and more than seven (7) motor vehicles owned by the Wammel Defendants
- Took steps to secure the office location of Defendant Wammel Group in Dickinson, Texas
- Coordinated with local law enforcement, where necessary, and property management for access to each premises; changed locks and disabled electronic access where in use; coordinated with property management and private security, where necessary, to assure future access was limited to the Receiver or her representatives
- Collected and/or forwarded all mail from Defendant Wammel's (former) primary residence to the Receiver and established protocol for handling of incoming mail
- Prepared detailed written and photographic inventories of assets in each location
- Coordinated with owners and/or landlords of leased premises

- Analyzed Receivership records and compiled preliminary list of accounts, players, and company structures
- Compiled inventories of all electronic equipment and coordinated with Ernst & Young regarding securing of electronic assets and imaging of electronic devices seized at the Wammel residences
- Compiled inventories of all personalty seized at the Wammel Defendants' real property and leased storage units
- Disposed of perishable items
- Performed thorough searches of real property leased and/or owned by the Wammel Defendants
- Prepared numerous boxes of materials and equipment which were packaged and forwarded to the Receiver
- Coordinated with U.S. Marshals, local police and private security service providers to further secure Receivership assets and records

#### **Interactions with Vendors, Investors, and Creditors**

- Engaged and worked with Veritas to perform forensic accounting and coordinated appropriate follow-up with respect to various identified accounts and/or persons or entities of interest discovered, as well as to investigate and determine identifying information as to the BUCF Investors, including amounts invested
- Worked with Veritas to perform forensic accounting and related analysis regarding, among other things, the intricate, overlapping Ponzi scheme operated by the Bryant and Wammel Defendants identified as part of the Receiver's investigation
- Communicated with and directed the work of forensic accounting firm for specific purposes in ascertaining the location of Receivership monies
- Supervised and analyzed forensic accounting results
- Determined the location of monies transferred by the Bryant Defendants and the Wammel Defendants that may be recoverable by the Receivership Estate
- Performed extensive analysis of forensic accounting to develop complete picture of cash flow through the Bryant Defendants' and the Wammel Defendants' accounts
- Fielded and responded to communications from investors
- Reviewed information submitted by investors in furtherance of the Receiver's duties pursuant to the Receivership Order
- Prepared, filed, and served the Receiver's Initial Report for the Wammel Defendants on all known Investors
- Established a line of communication with investors by updating the Receiver's website (<http://bucfreceivership.tklaw.com>) and provided Wammel Defendants' investors with the Receivership Order
- Formally notified all landlords/property managers of the Receivership

**Liquidation of the Bryant Defendants' Assets**

- Coordinated with relevant valuation consultants regarding inventoried personalty, including on-line auction house and gun consultant
- Coordinated with appraisers and auctioneers
- Catalogued property seized from the Bryant Defendants
- Obtained Court authority regarding liquidation of assets
- Accomplished liquidation of the Bryant Defendants' assets in the Receiver's possession

**SUMMARY OF FEES\***

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Discounted Rate/Hr</u></b>	<b><u>Amount</u></b>
William Banowsky	Partner	160.00	\$520.00	\$83,200.00
Timothy Hudson	Partner	311.30	475.00	147,867.50
Hunter Barrow	Partner	43.50	475.00	20,662.50
Katharine Clark	Partner	91.00	475.00	43,225.00
Mackenzie Wallace	Associate	315.50	420.00	132,510.00
Emily Miller	Associate	118.50	420.00	49,770.00
Mackenzie Salenger	Associate	209.90	280.00	58,772.00
Matthew Alexander	Associate	72.30	280.00	20,244.00
Sydne Collier	Attorney	103.20	280.00	28,896.00
Janice Graves	Paralegal	75.20	250.00	18,800.00
Eduardo Sanchez	Paralegal	193.90	190.00	36,841.00
<b>TOTAL FEES</b>		<b>1,694.30</b>		<b>\$640,788.00</b>

**Reimbursable Costs**

Air fare, lodging, ground transportation, and other vendors (e.g., locksmiths, utility providers, vehicle storage) to complete work performed:

Total Reimbursable Costs .....	\$ 4,443.03
TOTAL VOLUNTARY REDUCTIONS .....	\$ (90,103.20)
NET CURRENT BILLING FOR THIS MATTER** .....	\$ 555,127.83
TOTAL BALANCE DUE THIS MATTER .....	<b><u>\$ 676,393.08</u></b>

\*Net of time for timekeepers with time under 25 hours per month.

\*\*Reflects 20% discount on gross fees for professional services and netting out of fees for preparation of the Application.

# **EXHIBIT C**



August 14, 2017

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

Dear Ms. Ecklund:

Enclosed is our billing for professional assistance in the above-referenced matter for the period of July 1, 2017 through July 31, 2017 for your review and payment.

Should you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "Brandi N. Kleinman" with a stylized flourish at the end.

Brandi N. Kleinman  
Tax ID #68-0530157

Enclosure

BNK/cdt



August 14, 2017

Jennifer R. Ecklund, Esq.  
 Thompson & Knight LLP  
 One Arts Plaza  
 1722 Routh Street, Suite 1500  
 Dallas, Texas 75201

**Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

Professional fees and expenses in connection with the above-referenced matter for the period of July 1, 2017 through July 31, 2017:

**Professional Fees:**

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Brandi N. Kleinman	Vice President	52.25 hrs. @	\$325	\$ 16,981.25
Brian L. Ingram	Senior Manager	7.00 hrs. @	\$248	\$ 1,736.00
Paul A. Forbes	Senior Consultant	96.50 hrs. @	\$207	\$ 19,975.50
Matthew B. Dunn	Associate Consultant	42.00 hrs. @	\$175	\$ 7,350.00
<b>Total Professional Fees</b>				<b>\$ 46,042.75</b>

**Out-of-Pocket Expenses:**

Miscellaneous	\$ 19.50
<b>Total Out-of-Pocket Expenses</b>	<b>\$ 19.50</b>

<b>Total Professional Fees and Out-of-Pocket Expenses*</b>	<b>\$ 46,062.25</b>
--	---------------------

\*As of the date of this invoice, the outstanding balance of prior invoices is \$91,133.39.





**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(July 1, 2017 through July 31, 2017)*

<b>Date</b>	<b>Activity</b>	<b>Kleinman</b>	<b>Ingram</b>	<b>Forbes</b>	<b>Dunn</b>
7/3	Prepare exhibits for declaration.			1.50	
7/5	Prepare exhibits regarding Wammel and Bryant Family transfers.	4.00			
7/5	Review and analyze account and investor statements.			8.00	
7/5	Evaluate Referral Bonuses.				3.50
7/6	Prepare exhibits regarding Wammel and Bryant Family transfers.	4.00			
7/6	Review and analyze account and investor statements.			7.50	
7/6	Prepare summary of investor funds.				6.50
7/7	Prepare exhibits regarding Wammel and Bryant Family transfers.	3.00			
7/7	Preparation for and Conference Call with Client.	1.00			
7/7	Prepare exhibits for declaration.			3.50	
7/7	Review and analyze account and investor statements.			4.75	
7/7	Prepare summary of investor payouts / earnings.				3.00
7/7	Prepare BUCF to Proliquidation.				1.00
7/7	Summary of transfer funds from summary of investor funds.				4.00
7/10	Prepare financial data regarding Wammel and Bryant Family Entities.	1.75			
7/10	Prepare exhibits for declaration.			5.50	
7/10	Call with Counsel.			1.00	
7/10	Prepare Investor Summary Analysis.				5.50
7/11	Evaluate financial data regarding Wammel and Bryant Family Entities.	1.50			
7/12	Evaluate financial data regarding Wammel and Bryant Family Entities.	1.00			
7/12	Preparation for and call with Counsel.	1.50			
7/12	Prepare exhibits for declaration.			3.75	
7/12	Review and analyze bank statements.			4.25	
7/13	Evaluate financial data regarding Wammel and Bryant Family Entities.	2.50			
7/13	Preparation for and call with Counsel.	1.50			
7/13	Call with Counsel.			1.00	
7/13	Review and analyze bank statements.			7.50	
7/13	Options Express analysis.				1.00
7/14	Evaluate financial data regarding Wammel and Bryant Family Entities.	2.00			



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(July 1, 2017 through July 31, 2017)*

Date	Activity	Kleinman	Ingram	Forbes	Dunn
7/14	Call with Counsel.			0.50	
7/14	Review and analyze bank statements.			7.25	
7/15	Evaluate financial data regarding Wammel and Bryant Family Entities.	1.00			
7/16	Evaluate financial data regarding Wammel and Bryant Family Entities.	1.00			
7/16	Review and analyze bank statements.			5.00	
7/17	Review Wammell Investment Account Statements.	2.00			
7/17	Review and analyze bank statements.			6.50	
7/18	Meeting with Counsel to prepare for hearing.	5.00			
7/18	Review and analyze bank statements.			2.50	
7/18	Prepare final exhibits for motion.			5.00	
7/18	Research property information.			1.50	
7/19	Preparation for and Attendance at Hearing.	4.00			
7/19	Compile source documents for motion exhibits.			7.00	
7/20	Review Wammell Investment Account Statements.	2.00			
7/21	Review Wammell Investment Account Statements.	1.00			
7/24	Review and analyze Wammel Response(1); Evaluate additional documents(1).	2.00			
7/25	Research Investors and Residential Transactions.				2.00
7/26	Prepare exhibits for motion.			7.75	
7/26	Research other investor entities.				4.25
7/27	Review and analyze Wammel Response; Evaluate additional documents.	4.50			
7/27	Convert SEC-REC-EPROD-000000001 to spreadsheet.		7.00		
7/27	Analyze Top Agent Bank Statements.				3.25
7/27	Analyze Top Agent Bank Statements.				0.25
7/28	Review and analyze Wammel Response(1); Evaluate additional documents(1).	2.50			
7/28	Analyze Top Agent Bank Statements.				1.00
7/30	Prepare work papers for declaration.			1.25	
7/31	Evaluate Wammel Transactions.	3.50			
7/31	Prepare work papers for declaration .			4.00	
7/31	Prepare work papers for declaration .				6.75
	<b>Total</b>	<b>52.25</b>	<b>7.00</b>	<b>96.50</b>	<b>42.00</b>



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Expenses*  
*(July 1, 2017 through July 31, 2017)*

	<u>Amount</u>
Miscellaneous	
7/16/2017 Property report for use on exhibit requested by Attorney	<u>\$ 19.50</u>
Subtotal Miscellaneous	<u>\$ 19.50</u>
 <b>Total Out-of-Pocket Expenses</b>	 <b>\$ 19.50</b>



August 14, 2017

July 1, 2017  
to  
July 31, 2017

Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

THO-01-60-01-01 - 8/14

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**REMITTANCE COPY**

\*\*\*\*\*PLEASE RETURN WITH PAYMENT\*\*\*\*\*

*Remitted By:*

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Current Invoice Total:** \$ 46,062.25

Balance prior to this invoice: \$ 91,133.39

**If previous balance is unpaid as of receipt of this invoice, please pay: \$ 137,195.64**

**Please make check payable to:**

Veritas Advisory Group, Inc.

**Mailing address:**

Veritas Advisory Group, Inc.  
1601 Elm Street, Suite 3600  
Dallas, Texas 75201



September 21, 2017

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

Dear Ms. Ecklund:

Enclosed is our billing for professional assistance in the above-referenced matter for the period of August 1, 2017 through August 31, 2017 for your review and payment.

Should you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "Brandi N. Kleinman". The signature is fluid and cursive, with a long, sweeping underline.

Brandi N. Kleinman  
Tax ID #68-0530157

Enclosure

BNK/cdt

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

Professional fees and expenses in connection with the above-referenced matter for the period of August 1, 2017 through August 31, 2017:

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Brandi N. Kleinman	Vice President	50.00 hrs. @	\$325	\$ 16,250.00
Brian L. Ingram	Senior Manager	10.50 hrs. @	\$248	\$ 2,604.00
Paul A. Forbes	Senior Consultant	124.25 hrs. @	\$207	\$ 25,719.75
Krishna S. Desai	Associate Consultant	82.75 hrs. @	\$175	\$ 14,481.25
Total Professional Fees				\$ 59,055.00

Mileage	\$ 136.96	
Total Out-of-Pocket Expenses		\$ 136.96

**Total Professional Fees and Out-of-Pocket Expenses\*** **\$ 59,191.96**

App. 026





**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(August 1, 2017 through August 31, 2017)*

Date	Activity	Kleinman	Ingram	Forbes	Desai
8/1	Evaluate Wammel Transactions; Prepare for Hearing	8.00			
8/1	Prepare work papers for trial exhibits.			5.00	
8/2	Preparation for and attendance at hearing	8.00			
8/3	Prepare, review and compile documents for hearing and work papers for trial exhibits.			4.00	
8/8	Evaluation of Investor Funds for BUCF and Wammel Investors	2.00			
8/9	Evaluation of Investor Funds for BUCF and Wammel Investors	2.00			
8/9	Analyze bank statements.			4.00	
8/10	Evaluation of Investor Funds for BUCF and Wammel Investors	2.00			
8/10	OCR 159 pdfs for 1259 pages.		6.00		
8/10	Analyze bank statements.			3.50	
8/10	Compile bank statement database.			1.50	
8/11	Evaluation of Investor Funds for BUCF and Wammel Investors	2.00			
8/11	OCR 159 pdfs for 1259 pages.		1.50		
8/11	Analyze bank statements.			6.75	
8/14	Review and evaluate Bryant Realty Transactions(1); Summarize Goodspeed Transactions(1)	2.00			
8/14	OCR 'SEC-FBI-EPROD-000012487.pdf' and 'FBI-EPROD-000001283.pdf'		3.00		
8/14	Analyze bank statements.			7.50	
8/15	Review and evaluate Bryant Realty Transactions(1); Summarize Goodspeed Transactions(1)	2.00			
8/15	Compile bank statement database.			5.50	
8/16	Review and evaluate Bryant Realty Transactions(1); Summarize Goodspeed Transactions(1)	2.00			
8/16	Prepare summary of bank statement transactions			5.50	
8/16	Building database of transactions				1.50
8/17	Review and evaluate Bryant Realty Transactions(1); Summarize Goodspeed Transactions(1)	2.00			
8/17	Analyze bank statements.			7.00	
8/17	Building database of transactions				7.00
8/18	Prepare summary of bank statement transactions			8.00	
8/18	Building database of transactions				7.00
8/21	Call with Counsel re: Motion to Liquidate(1); Prepare for Hearing(1); Review Top Agent Transactions(1); Investor Analysis(1)	4.00			



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(August 1, 2017 through August 31, 2017)*

Date	Activity	Kleinman	Ingram	Forbes	Desai
8/21	Analyze bank statements.			7.50	
8/21	Building database of transactions				7.50
8/22	Call with Counsel re: Motion to Liquidate(1); Prepare for Hearing(1); Review Top Agent Transactions(1); Investor Analysis(1)	4.00			
8/22	Review investor statements and compile investor returns.			6.50	
8/22	Building database of transactions				7.00
8/23	Review investor statements and compile investor returns.			7.00	
8/23	Building database of transactions				7.50
8/24	Call with Counsel re: Motion to Liquidate(1); Prepare for Hearing(1); Review Top Agent Transactions(1); Investor Analysis(1)	4.00			
8/24	Review investor statements and compile investor returns.			7.00	
8/24	Building database of transactions				7.00
8/25	Review investor statements and compile investor returns.			7.50	
8/25	Building database of transactions				7.50
8/28	Review investor statements and compile investor returns.			7.75	
8/28	Database building				7.75
8/29	Sources and Uses Analysis; Investor Analysis	2.00			
8/29	Review investor statements and compile investor returns.			7.25	
8/29	Database building				7.00
8/30	Sources and Uses Analysis(1); Investor Analysis(1)	2.00			
8/30	Review investor statements and compile investor returns.			6.75	
8/30	Prepare exhibit for filing.			1.00	
8/30	Database building				8.00
8/31	Sources and Uses Analysis(1); Investor Analysis(1)	2.00			
8/31	Compile bank statement database.			7.75	
8/31	Database building				8.00
	<b>Total</b>	<b>50.00</b>	<b>10.50</b>	<b>124.25</b>	<b>82.75</b>



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.***Description of Expenses**(August 1, 2017 through August 31, 2017)*

	<u>Amount</u>
Mileage	
8/2/2017 B. Kleinman - Mileage to/from Hearing	\$ 68.48
8/22/2017 B. Kleinman - Mileage to/from Hearing	<u>\$ 68.48</u>
Subtotal Mileage	<u>\$ 136.96</u>
 <b>Total Out-of-Pocket Expenses</b>	 <b>\$ 136.96</b>



September 21, 2017

August 1, 2017

to

August 31, 2017

Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

THO-01-60-01-01 - 9/21

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**REMITTANCE COPY**

\*\*\*\*\*PLEASE RETURN WITH PAYMENT\*\*\*\*\*

*Remitted By:*

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Current Invoice Total:** **\$ 59,191.96**

Balance prior to this invoice: \$ 137,195.64

**If previous balance is unpaid as of receipt of this invoice, please pay: \$ 196,387.60**

**Please make check payable to:**

Veritas Advisory Group, Inc.

**Mailing address:**

Veritas Advisory Group, Inc.  
1601 Elm Street, Suite 3600  
Dallas, Texas 75201



October 9, 2017

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

Dear Ms. Ecklund:

Enclosed is our billing for professional assistance in the above-referenced matter for the period of September 1, 2017 through September 30, 2017 for your review and payment.

Should you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "Brandi N. Kleinman/cdt". The signature is written in a cursive style.

Brandi N. Kleinman  
Tax ID #68-0530157

Enclosure

BNK/cdt



October 9, 2017

Jennifer R. Ecklund, Esq.  
 Thompson & Knight LLP  
 One Arts Plaza  
 1722 Routh Street, Suite 1500  
 Dallas, Texas 75201

**Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

Professional fees and expenses in connection with the above-referenced matter for the period of September 1, 2017 through September 30, 2017:

**Professional Fees:**

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Brandi N. Kleinman	Vice President	18.00 hrs. @	\$325	\$ 5,850.00
Paul A. Forbes	Senior Consultant	120.50 hrs. @	\$207	\$ 24,943.50
Krishna S. Desai	Associate Consultant	26.50 hrs. @	\$175	\$ 4,637.50
Total Professional Fees*				\$ 35,431.00

\*As of the date of this invoice, the outstanding balance of prior invoices is \$196,387.60.



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(September 1, 2017 through September 30, 2017)*

Date	Activity	Kleinman	Forbes	Desai
9/1	Sources and Uses Analysis; Investor Analysis	2.00		
9/1	Prepare exhibit for filing.		7.25	
9/1	Bryant personal expenses analysis			7.00
9/5	Prepare exhibit for filing.		2.00	
9/5	Review investor statements and compile investor returns.		6.00	
9/5	Database completion			6.00
9/6	Review investor statements and compile investor returns.		8.00	
9/6	Database completion			4.00
9/7	Review investor statements and compile investor returns.		5.75	
9/7	Database completion			2.00
9/8	Review investor statements and compile investor returns.		6.00	
9/8	Database completion			1.50
9/11	Preparation for and call with Client	0.75		
9/11	Prepare summary of accounts; Investor Analysis	1.25		
9/11	Prepare exhibit for filing.		5.00	
9/11	Review and analyze account statements.		3.00	
9/11	Stephen Garrett, Dennis Stephens transactions			1.00
9/12	Prepare summary of accounts; Investor Analysis	2.00		
9/12	Prepare exhibit for filing.		2.50	
9/12	Review and analyze account statements.		6.00	
9/13	Review and analyze account statements.		8.00	
9/14	Prepare summary of accounts; Investor Analysis	2.00		
9/19	Investor Analysis	1.00		
9/20	Investor Analysis	1.50		
9/20	Review and analyze bank statements.		8.00	
9/21	Investor Analysis	1.50		
9/21	Review and analyze bank statements.		8.00	
9/22	Investor Analysis	2.00		
9/22	Review and analyze bank statements.		8.00	
9/25	Investor Analysis	1.00		
9/25	Review investor statements and compile investor returns.		8.00	
9/26	Investor Analysis	1.00		
9/26	Review investor statements and compile investor returns.		8.00	



**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

*Description of Activities for Task Code F170 Forensic Accounting*

*(September 1, 2017 through September 30, 2017)*

<b>Date</b>	<b>Activity</b>	<b>Kleinman</b>	<b>Forbes</b>	<b>Desai</b>
9/26	Analyzing suspicious transaction			2.00
9/27	Review investor statements and compile investor returns.		3.00	
9/27	Review and analyze bank statements.		2.00	
9/27	Analyzing suspicious transaction			3.00
9/28	Investor Analysis	1.00		
9/28	Review investor statements and compile investor returns.		8.00	
9/29	Investor Analysis	1.00		
9/29	Review investor statements and compile investor returns.		8.00	
	<b>Total</b>	<b>18.00</b>	<b>120.50</b>	<b>26.50</b>



October 9, 2017

September 1, 2017  
to  
September 30, 2017

**Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.**

**THO-01-60-01-01 - 10/9**

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\*\*\*\*\*PLEASE RETURN WITH PAYMENT\*\*\*\*\*

*Remitted By:*

Jennifer R. Ecklund, Esq.  
Thompson & Knight LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201

**Current Invoice Total:** **\$ 35,431.00**

Balance prior to this invoice: \$ 196,387.60

**If previous balance is unpaid as of receipt of this invoice, please pay: \$ 231,818.60**

**Please make check payable to:**

Veritas Advisory Group, Inc.

**Mailing address:**

Veritas Advisory Group, Inc.  
1601 Elm Street, Suite 3600  
Dallas, Texas 75201